

**UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA**

NATIONAL ASSOCIATION FOR)	
GUN RIGHTS, INC.,)	Case No. CV 16-0023-H-DLC
)	
Plaintiff,)	MEMORANDUM IN
)	SUPPORT OF PLAINTIFF’S
JONATHAN MOTL, in his official)	MOTION FOR SUMMARY
Capacity as the Commissioner of)	JUDGMENT
Political Practices for the State of)	
Montana; TIMOTHY C. FOX, in his)	
Official capacity as Attorney General)	
For the State of Montana; LEO)	
GALLAGHER, in his official capacity)	
as County Attorney for the County of)	
Lewis & Clark,)	
)	
Defendants.)	

DECLARATION OF DUDLEY BROWN

I, Dudley Brown, hereby declare as follows:

1. I am the President of the National Association for Gun Rights, Inc. (“NAGR”).
2. As President, I am responsible for overseeing and supervising the day-to-day operations of NAGR. In this capacity, I have personal knowledge of NAGR’s operations, finances, and issue advocacy strategy. I have final decision making authority for NAGR regarding operations, finances, and strategy.
3. NAGR is a non-profit organization that engages in education, advocacy, and grassroots activities involving the Second Amendment to the United States Constitution. NAGR’s efforts are solely focused on the public discussion of the issue of the right to bear arms.

One of NAGR's main efforts is to educate the public about the positions and voting records of public officials and candidates regarding the Second Amendment.

4. As part of this effort to keep the public informed, NAGR routinely sends out literature that is materially similar to Exhibit 1 of the Complaint.

5. NAGR does not advocate for or against any candidate for public office, nor does its literature contain language that could be reasonably interpreted as an appeal to vote for or against a candidate.

6. NAGR intends to send out such literature to Montanans during the 2018 election cycle and will spend more than \$250.00 (primarily printing and mailing) to inform Montanans of the positions and voting records of public officials and candidates regarding the Second Amendment.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Dated: February 15, 2017

A handwritten signature in black ink, appearing to read "Dudley Brown", written over a horizontal line.

/s/ Dudley Brown